

UNITED STATES BANKRUPTCY COURT
Northern District of California

In re:) Bankruptcy No.: 19-30088 (DM)
) R.S. No.: MET-964
PG& E CORPORATION AND)
PACIFIC GAS AND ELECTRIC)
COMPANY)
) Hearing Date: February 11, 2020
) Time: 10:00 a.m.
Debtors)
_____)

Relief From Stay Cover Sheet

Instructions: Complete caption and Section A for all motions. Complete Section B for mobile homes, motor vehicles, and personal property. Complete Section C for real property. Utilize Section C as necessary. If moving party is not a secured creditor, briefly summarize the nature of the motion in Section D.

(A) Date Petition Filed: 1/29/2019 Chapter: 11
Prior hearings on this obligation: none Last Day to File §523/§727 Complaints:

(B) Description of personal property collateral (e.g. 1983 Ford Taurus):

Secured Creditor [] or lessor []

Fair market value: \$ _____ Source of value: _____
Contract Balance: \$ _____ Pre-Petition Default: \$ _____
Monthly Payment: \$ _____ No. of months: _____
Insurance Advance: \$ _____ Post-Petition Default: \$ _____
No. of months: _____

(C) Description of real property collateral (e.g. Single family residence, Oakland, CA):

Fair market value: \$ _____ Source of value: _____ If appraisal, date: _____

Moving Party's position (first trust deed, second, abstract, etc.):

Approx. Bal. \$ _____ Pre-Petition Default: _____
As of (date): _____ No. of months: _____
Mo. payment: \$ _____ Post-Petition Default: \$ _____
Notice of Default (date): _____ No. of months: _____
Notice of Trustee's Sale: _____ Advances Senior Liens: \$ _____

Specify name and status of other liens and encumbrances, if known (e.g. trust deeds, tax liens, etc.):

Position	Amount	Mo. Payment	Defaults
1 st Trust Deed: _____	\$ _____	\$ _____	\$ _____
2 nd Trust Deed: _____	\$ _____	\$ _____	\$ _____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
(Total)	\$ _____	\$ _____	\$ _____

Other pertinent information:

The Plaintiff seeks relief from stay to amend the complaint in its pre-petition personal injury Lawsuit to add a new defendant, clarify the description of the real property where the Incident occurred, add new language to the Complaint regarding Plaintiff's actions, remove defendants, and add new causes of action against existing defendants. The Amended Complaint will not add any new causes of action against PG&E, nor is Movant seeking relief from stay to pursue the Lawsuit against PG&E at this time.

Dated: January 28, 2020

/s/ Mary Ellmann Tang

Signature

Mary Ellmann Tang, Esq.

Print or Type Name

Attorney for Cristina Mendoza